Fw: ESI - Proposed Stormwater Contingency Plan

VERNETA SIMON to: Ernesto Manzon, Gordon Clarke, Phillip Brown

10/17/2010 04:57 PM

Please add the below e-mail message to the ESI SDMS file and AR index. Thanks, Verneta
----- Forwarded by VERNETA SIMON/R5/USEPA/US on 10/17/2010 04:49 PM -----

From:	"GROVES, RYAN" <RGROVES@idem.IN.gov>
To:	VERNETA SIMON/R5/USEPA/US@EPA, ANITA BOSEMAN/R5/USEPA/US@EPA
Cc:	Charles Gebien/R5/USEPA/US@EPA, Carol Staniec/R5/USEPA/US@EPA, Noel Vargas/R5/USEPA/US@EPA, "ATKINSON, HARRY" <HATKINSO@idem.IN.gov>, "McDaniel, Ken" <KMCDANIE@idem.IN.gov>, "RIGNEY, STAN" <SRIGNEY@idem.IN.gov>, "Nagle, Megan" <MNagle@idem.IN.gov>, "Braun, Randy" <RBRAUN@idem.IN.gov>
Date:	10/14/2010 04:54 PM
Subject:	RE: ESI - Proposed Stormwater Contingency Plan

Anita and Verneta:

I have just recently had conversations with our storm water management program folks. They are concerned about the following and will need answers to the following to construct an ARAR storm water plan for EPA.

1. What is the timeline to complete these activities?

2. Is the bulleted plan below the exact order in which structures will be addressed and waste handled? Can this be shown as keynotes on a facility plan so that our storm water folks can better understand the flow through the facility and EPA's objectives on close down? If this is intended to be the exact sequence of waste processing and facility shutdown it appears that EPA would like to discharge storm water during close down and waste processing on an ongoing basis, not clear on that?

3. IDEM would prefer that EPA hold storm water created through/during facility cleaning and closeout until structures are completely sealed off and cleaned. IDEM would prefer that EPA then characterize and compare storm water against surface water quality standards to determine if storm water can be discharged with or without pretreatment or vacuumed up and taken off for disposal. IDEM would prefer to hold off on storm discharge until the facility is clean and stable so that IDEM knows that concentrations of storm water constituents of concern will/should not change.

4. IDEM proposes the following chemical specific constituents for storm water discharge characterization:

PCBs, BTEX, lead, cadmium, barium, chromium, zinc, PAHs, Oil & Grease, PCE/TCE in addition to the general/wet chemistry parameters such as TSS, TDS, COD, BOD, ammonia, etc.

5. Current thinking is the hardest standard to meet may be Oil & Grease at 10 to 20 mg/L based upon storm water sample data to date and the PCBs are IDEM's big concern on holding back storm water until activities are complete. IDEM would look at Best Mgt Practices in dealing with storm water, so GAC or some treatment of storm water could come into play.

Verneta or Anita, I would suggest a conference call ASAP with yourself and folks with our storm water so that they can understand your objectives and abilities so that we can quickly put together an appropriate ARAR storm water

program.

Thanks.

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-----Original Message-----
From: Simon.Verneta@epamail.epa.gov [mailto:Simon.Verneta@epamail.epa.gov]
Sent: Saturday, October 09, 2010 2:20 PM
To: Jason Doerflein; Wise, Richard; ATKINSON, HARRY; GROVES, RYAN; McDaniel, Ken; tjedward@indygov.org; Cussen, Kim; Jones, Steve
Cc: Gebler.Charles@epamail.epa.gov; Staniec.Carol@epamail.epa.gov; Vargas.Noel@epamail.epa.gov
Subject: ESI - Proposed Stormwater Contingency Plan

Below is a proposed contingency plan. Please review and provice comments by e-mail by COB on 10/11. I realize Columbus Day, may be a holiday, so if you don't receive this message until 10/12, please call me on my cell at (312) 802-1404.

The primary focus of this plan is to manage storm water run-off to insure that the storm water is properly drained from the site. The basis of the plan is to redirect the storm water away from existing process equipment and divert it to Oil Creek which runs to the east of the facility. Storm water currently empties into one of two one-million gallon Raw Water storage tanks (West Storage Tank) and a key element of the plan will be to "cut-off" this flow and redirect this water to run off the site into the ditch tributary to the Oil Creek.

Below is a conceptual outline of the proposed activities to manage the storm water run-off during the shutdown of the facility.

- Plug 36" line downstream of manhole connected to the West Raw Water tank.
- Pump out storm water drainage system, including catch basin sumps on site.
- Jet or flush clean the storm water drainage system to removed potential contaminants in the system.
- Also clean visibly oil stained areas around drainage inlets.
- Jet and clean existing trenches exposed to potential storm water run-off (outdoor trenches).
- Discharge from the system is to be stored in the East Raw Water tank or disposed of off-site at an approved facility.
- Insert Dandy Bags (sediment collector w/ oil absorbent skirt) beneath manhole inlet grates
- Install storm drain from existing manhole #115 (NW of Vacuum Press & Sludge Building) to existing drainage ditch along east border of site. Approximately 125 linear feet of 18" PVC piping.
- Replace Man-way lids on the West and East Raw Water Tanks.
- Replace the lids on the DAF and other treatment tanks

to prevent potential overflow onto surface waters.
- Place oil absorbent boom in Oil Creek at entrance from ditch.
- Collect storm water samples confirming that outfall discharge is compliant with NPDES regulations.